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September 24, 2013

**VIA ELECTRONIC MAIL**

The Honorable Denise L. Cote  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 1610  
New York, NY 10007-1312

Re: *FHFA v. JPMorgan Chase & Co.*, 11 Civ. 6188 (DLC); *FHFA v. Merrill Lynch & Co., Inc.*, 11 Civ. 6202 (DLC); and *FHFA v. Bank of America Corp.*, 11 Civ. 6195 (DLC).

Dear Judge Cote:

We write on behalf of Plaintiff Federal Housing Finance Agency (“FHFA”), and with the consent of the defendants in the above-captioned actions, to jointly request that the Court enter the enclosed Stipulation and [Proposed] Order concerning certain adjustments to the expert discovery schedule. First, pursuant to the Court’s recommendation at the August 14, 2013 status conference, the parties have adopted an expert disclosure protocol, as set forth in the enclosed Stipulation and [Proposed] Order. Second, the parties have agreed to adjust the deadline concerning third party discovery to March 28, 2014—the same deadline as proposed in the Tranche 3 and 4 cases. Finally, FHFA and the Bank of America defendants have agreed to extend the expert discovery cut off to July 25, 2014 so as to be consistent with the proposed Tranche 3 and 4 schedules.

The parties are available to discuss this submission at the Court’s request. Thank you for Your Honor’s consideration.

Respectfully submitted,

/s/ Manisha M. Sheth

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cc: All Counsel of Record